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File No. 095108B

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY**

<b>In re:</b>	:	<b>CHAPTER 13</b>
<b>Dominic Forte</b>	:	<b>CASE NO. 17-28799-JNP</b>
<b>DEBTOR</b>	:	<b>CERTIFICATION IN SUPPORT OF MOTION TO VACATE AUTOMATIC STAY AND FOR PROSPECTIVE RELIEF</b>
	:	

I, Chastity Wilson - Assistant Secretary, do hereby certify:

1. I am an authorized representative of Nationstar Mortgage LLC d/b/a Mr. Cooper, servicer for the Mortgagee, Deutsche Bank National Trust Company as Trustee for the Soundview Home Loan Trust 2007-NS1 Asset-Backed Certificates, Series 2007-NS1, and I am thoroughly familiar with the within named matter.

2. On April 18, 2017, Debtor filed a Chapter 13 Bankruptcy Petition in the United States Bankruptcy Court for the District of New Jersey, Case No. 17-17771-JNP. On May 3, 2017, a Dismissal Order was entered due to Debtor's failure to file information, allowing Mortgagee to proceed with its foreclosure action in the Superior Court of New Jersey.

3. On July 17, 2017, Debtor filed a Chapter 13 Bankruptcy Petition in the United States Bankruptcy Court for the District of New Jersey, Case No. 17-24426-JNP. On August 1, 2017, a Dismissal Order was entered due to Debtor's failure to file information, allowing Mortgagee to proceed with its foreclosure action in the Superior Court of New Jersey.

4. Once again, on September 15, 2017, Debtor filed a Chapter Bankruptcy Petition in the United States Bankruptcy Court for the District of New Jersey, Case No. 17-28799-JNP.

5. Foreclosure proceedings had commenced when the instant Petition in bankruptcy was filed and, upon information and belief, that action (which was prosecuted by another law firm) remains pending in the Superior Court of New Jersey

6. Debtor's last payment was made on January 18, 2018 and applied to the December 1, 2017 **post-Petition** payment; no further payments have been received to the Mortgagee's knowledge as of the date hereof.

7. The regular monthly mortgage payment, including taxes and insurance,

is:

\$ 1,343.05

8. Debtor should have made 5 payments outside the plan since the date of filing.

9. Since the date of the most recent filing, Debtor has made 3 complete payments. Attached is an itemization of each regular mortgage payment by date, amount and mode of payment, as indicated by the Mortgagee's records as of the date hereof, if applicable. Inquiries regarding the number, date, amount and application of payments may be made to the Mortgagee's local counsel identified at the top of the first page of this Certification, or the Mortgagee and, upon request, an itemization will be timely provided.

10. Debtor is delinquent 2 months payments outside the plan, through the payment due February 1, 2018.

11. The total amount of delinquency outside the plan is \$ 1,431.12. This amount is computed in the following matter:

Total pymt./mo. (\$1,343.05) X No. mos. in arrears (2) = \$2,686.10

Minus suspense balance of <\$1,254.98>

12. The information contained in this Certification is current as to payments received on or before the date of execution of Certification. Inquiries regarding the number, date, amount and application of payments may be made to the Mortgagee's local counsel or the Mortgagee. The information contained in the foregoing paragraphs relate only to the Mortgagee's allegation of post-Petition default "outside" the Chapter 13 Plan. Information regarding Mortgagee's allowed Secured Claim, representing the pre-Petition

mortgage default to be cured "inside" the Chapter 13 Plan, may be obtained from examination of the Mortgagee's filed Proof of Claim which is available from the Bankruptcy Court Clerk's office or the Mortgagee's local counsel.

13. The Mortgagee's records reflect that the total amount due on the said mortgage contract is computed as follows (including amounts owed both pre- and post-Petition):

a. Unpaid Principal:	<u>\$ 92,263.75</u>
b. Accrued Interest:	<u>\$ 24,057.90</u>
c. Unpaid Late Charges from _____, D/Default	<u>\$ _____</u>
d. Recoverable Corporate Advances:	<u>\$ 6,122.28</u>
e. Escrow Advances: including Taxes, Insurance premiums, periodic post-default property inspections	<u>\$ 12,199.39</u>
f. Unearned Interest:	<u>\$ _____</u>
g. Per Diem Interest	<u>\$ 26.36</u>
h. Any Other Charges:	<u>\$ _____</u>
i. Supsense/Unapplied Funds balance	<u>\$ &lt;2,047.97&gt;</u>
Total Due:	<u>\$ 132,595.35</u>

The foregoing calculations do not constitute a demand for immediate payment and certain items may also be included in calculations of the alleged post-Petition default and/or in the filed Proof of Claim. The foregoing calculations are included herein pursuant to Local Rule 3 for the Court's information as applicable. The foregoing calculations constitute the amounts due on the mortgage contract as of the date hereof on the

hypothetical assumptions that no Bankruptcy Petition has been filed and that no Judgment in foreclosure has been entered. Questions regarding or objections to the foregoing calculations may be made to the Mortgagee's local counsel identified at the top of the first page of this Certification or to the Mortgagee directly.

14. Mortgagee, Deutsche Bank National Trust Company as Trustee for the Soundview Home Loan Trust 2007-NS1 Asset-Backed Certificates, Series 2007-NS1, requests that this Honorable Court execute the Order Lifting Automatic Stay due to Debtor's numerous filings and failure to maintain required plan payments in previous Bankruptcy Plans. Mortgagee also requests that provision be made in the Court's Order that the Automatic Stay of 11 U.S.C. 362(A) will not be reinstated against the Mortgagee in the event of future Bankruptcies filed by either or both Mortgagors or any other person or entity acting on their behalf under any Chapter of the U.S. Bankruptcy Code.


15. As a result of the foregoing, other matters of record, the duration and extent of the Debtor's, delinquency, the prejudice and expense already incurred. Movant respectfully requests that any relief from or modification of the Automatic Stay granted herein be immediately effective, pursuant to Federal Rule of Bankruptcy Procedure 4001 (a) (3).v

16. Nationstar Mortgage LLC d/b/a Mr. Cooper services the loan on the Property referenced in this Motion. In the event the automatic stay in this case is modified, this case dismisses, and/or the Debtor obtains a discharge and a foreclosure action is commenced on the mortgaged property, the foreclosure will be conducted in the name of Movant or Movant's successor or assignee. Movant, directly or through an agent, has possession of the Note. The Note is either made payable to Movant or has been duly endorsed.

Movant is the original mortgagee or beneficiary or the assignee of the Mortgage/Deed of Trust.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment for contempt of Court.

DATED: February 20, 2018

  
Chastity Wilson  
Assistant Secretary of  
Nationstar Mortgage LLC  
d/b/a Mr. Cooper  
Affiant

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(C)

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Attorneys' for the Mortgagee

File No. 095108B

In Re:

Dominic Forte

Case No.: 17-28799-JNP

Chapter 13

Hearing date: March 20, 2018

Judge: Jerrold N. Poslusny Jr.

**CERTIFICATION RE POST-PETITION PAYMENT HISTORY  
ON THE NOTE AND MORTGAGE DATED September 22, 2016**

Chastity Wilson of full age, employed as Assistant Secretary by  
Nationstar Mortgage LLC d/b/a Mr. Cooper Deutsche Bank National Trust Company as Trustee for the  
Soundview Home Loan Trust 2007-NS1 Asset-Backed Certificates, Series 2007-NS1, hereby certifies  
the following information:

**BACKGROUND INFORMATION**

1. Recorded on October 20, 2016 in Camden County, in Book 08363 at Page 1518
2. Property Address: 2117 South Brighton Avenue, Clementon, NJ 08021
3. Mortgage Holder: Deutsche Bank National Trust Company as Trustee for the Soundview Home Loan Trust 2007-NS1 Asset-Backed Certificates, Series 2007-NS1
4. Mortgagor(s)/Debtor(s): Dominic Forte and Donna Lynn Forte
5. Date debtor(s) petition was filed: September 15, 2017
6. Post-petition payment address: Nationstar Mortgage LLC, ATTN: Bankruptcy Department, 350 Highland Drive, Lewisville, TX 75067

**AMOUNT OF POST-PETITION DEFAULT**  
(As of February 1, 2018)

7. Amount of debtor(s) monthly mortgage payment: \$ 1,343.05  
 8. Amount of debtor(s) monthly late charge: \$             
 9. Total monthly payment including late charge: \$ 1,343.05  
 10. Since the petition date, 5 payments should have been made to the mortgagee. Since the petition date only 3 complete payment(s) have been made, leaving 2 payment(s) in arrears through the payment due February 1, 2018. The total amount of post-petition payment default (monthly payments) minus the suspense balance is \$ 1,431.12.

AMOUNT DUE	DATE PAYMENT WAS DUE	HOW PAYMENT WAS APPLIED (MO./YR.)	AMOUNT RECEIVED	DATE PAYMENT RECEIVED	SUSPENSE
1. \$1,343.05	10/1/17	10/1/17	\$1,343.05	10/5/17	
2. \$1,343.05	11/1/17	11/1/17	\$1,305.54 \$1,330.00	11/13/17 12/11/17	\$1,292.49
3. \$1,343.05	12/1/17	12/1/17	\$1,305.54 \$37.51	1/18/18 SUSPENSE	\$1,254.98
4. \$1,343.05	1/1/18		\$0.00		\$1,254.98
5. \$1,343.05	2/1/18		\$0.00		\$1,254.98
6.					
7.					
8.					
9.					
10.					
<b>TOTAL</b>					

If the monthly payment has changed during the pendency of the case, please explain (attach separate sheet(s) if necessary):

**AMOUNT HELD IN SUSPENSE (if any):** \$ 1,254.98

Effective as of 10/1/17, the current monthly payment is comprised of:

Principal and Interest.....\$902.06

Escrow.....\$440.99

Late Charge .....\$

Other .....\$

(Specify) \_\_\_\_\_)

**TOTAL.....\$1,343.05**

11. Additional charges and/or advances made post-petition:  
 a) Post-petition bankruptcy fees/costs for within motion: \$ 350.00 & \$181.00  
 b) Post-petition advances made for taxes: \$



c) Post-petition advances made for insurance: \$\_  
d) Other fees \$\_  
(please specify): \_

I certify under penalty of perjury that the foregoing is true and correct.

February 20, 2018  
Date of signature

Charlity Wilson  
Signature

Charlity Wilson  
Assistant Secretary of  
Nationstar Mortgage LLC  
d/b/a Mr. Cooper  
Affiant